

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BROOKE K. WHITMAN, Individually and)
as Mother and Next Friend of SAMANTHA)
KATE WHITMAN, a minor, and JOEL)
WHITMAN, Individually)
Plaintiffs)
vs.)
AUTOMATIC DATA PROCESSING, INC.,)
CHANNEL ONE COMMUNICATIONS)
CORPORATION, d/b/a CHANNEL ONE)
NETWORK, and PRIMEDIA, INC.)
Defendants)
Civil Action No.
03-CV-12543RGS

**JOINT STATEMENT OF PARTIES
PURSUANT TO LOCAL RULE 16.1(D)**

Now come the parties and pursuant to Local Rule 16.1(D), hereby submit the following

Joint Statement:

(1) Joint Discovery Plan

1) The parties will file the Automatic Disclosures required by Local Rule 26.1(B) by

April 5, 2004.

2) The parties will file all written discovery requests, and take all depositions by

December 31, 2004

The parties cannot agree on the dates for disclosure of expert witnesses and their expected testimony at trial, in compliance with Rule 26(b)(4)(B) and all applicable Rules and Local Rules. The Plaintiffs' propose the following:

That the Plaintiffs identify their expert witnesses by September 17, 2004; that the Defendants then identify their expert witnesses by November 30, 2004; and that the Plaintiffs then identify their expert rebuttal testimony by December 31, 2004.

The Defendants propose the following:

That the Plaintiffs identify their expert witnesses by July 5, 2004; that the Defendants then identify their expert witnesses by September 7, 2004; and that the Plaintiffs then identify their expert rebuttal testimony by October 12, 2004.

(2) Proposed Schedule for Filing Motions

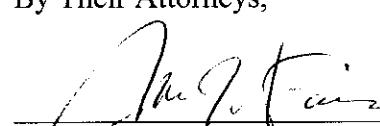
The parties will file all Rule 37 and Rule 56 Motions by January 31, 2005.

(3) Certifications of Counsel and Parties

The parties agree to file their Rule 16.1(D)(3) Certifications separately, and not as part of this Joint Statement.

The Plaintiffs,
By Their Attorneys,

Dated: 3/17/04


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By Its Attorney,

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The Defendant, Channel One
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By Its Attorneys,

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